

September 30, 2022

VIA ECF

The Honorable P. Kevin Castel
United States District Judge
Daniel Patrick Moynihan, United States Courthouse
500 Pearl St., Courtroom 11D
New York, New York 10007

**Re: *In re Google Digital Advertising Antitrust Litig.*, 1:21-md-03010
(S.D.N.Y.) (PKC); Discovery Steering Committee; This Document
Relates to: ALL ACTIONS**

Dear Judge Castel:

We write regarding the Court's Pre-Trial Order No. 2 (Dkt. No. 309) (***PTO2***) and Pre-Trial Order No. 3 (Dkt. No. 311) (***PTO3***) to update the Court regarding the Case Management Plan and the Discovery Steering Committee. No conference is scheduled at this time.

On September 14, 2022, in ***PTO2***, the Court designated the Plaintiffs' Lead Attorneys (***PLA***) as "Lead Counsel for the State plaintiffs (Mr. Lanier), Interim Lead Co-Counsel of the putative advertiser class (Ms. Sharp and Ms. Wolfson) and Lead Counsel for the Publisher Class (Mr. Boies)" and instructed the PLA to meet and confer on a proposed Case Management Plan and Scheduling Order; and within 21 days (by October 5, 2022), to submit a joint proposal to Google and other individual plaintiffs for consideration and negotiation, ultimately submitting a proposal from the PLA to the Court within 45 days (by October 29, 2020). Today, the PLA submitted its proposal to Google and the Individual Action plaintiffs, and is prepared to begin negotiations for submission to the Court.

Pursuant to the Court's September 16, 2022, ***PTO3***, the PLA designates a Discovery Steering Committee consisting of: States (Zeke DeRose, Lanier Law Firm and Jason Zweig, Keller Postman); Publisher Class (Philip Korologos, Boies Schiller Flexner LLP), Advertiser Class (Jordan Elias, Girard Sharp LLP), and Individual Actions (Serina Vash, Herman Jones LLP). The PLA further notes that, consistent with ***PTO2*** and ***PTO3***, we and the Discovery Steering Committee will continue to draw upon the substantial resources, skills, and knowledge of other counsel involved in these matters including, *e.g.*, John Thorne and the other lawyers representing Individual Action plaintiff Daily Mail.

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The PLA will begin assigning tasks accordingly. Thank you for your guidance.

Respectfully submitted,

Plaintiffs' Lead Attorneys

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CC (via ECF): All Counsel of Record